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DEPARTMENT
OF HEALTH

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August 28, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, CO 80402

RE: DRAFT, PHASE I RFI/RI WORK PLAN, INSIDE BUILDING CLOSURES
(OPERABLE UNIT 15), U. S. DEPARTMENT OF ENERGY, MAY 1992

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the subject document submitted by DOE and prime contractor, EG&G. The Division's comments, as well as those of EPA and its contractor (PRC), are attached.

While the work plan as presently written presents a mostly adequate framework, it is inadequate in several respects. The Division believes that the Field Sampling Plan does not fully address the minimum requirements for the OU-15 RFI/RI report as outlined in the IAG Statement of Work:

1. Characterize the nature, rate of transport and extent of contamination.
2. Define pathways and methods of migration.
3. Identify areas threatened by releases from the facility.
4. Determine short- and long-term threats to human health and the environment.

In particular, the sampling outlined in the FSP cannot provide sufficient information to define the extent of contamination beyond IHSS boundaries. Also, a staged plan is mentioned, but not fully developed to allow for contingency and flexibility. Several sampling and monitoring procedures need to be generated.

The RCRA clean closure standard along with occupational radiation standards will be established as ARARs for OU-15. Therefore, the Benchmark tables and the associated discussion will not apply.

ADMIN RECORD

A Human Health Risk Assessment will be required only if radio-nuclide contamination is documented at any of the IHSSs. This risk assessment will consider industrial/occupational future uses with RFP workers and visitors as the potential receptors.

In the Division's August 6, 1992 letter to DOE, the integration of the RFI/RI and Closure was clarified. The Division proposed one comprehensive RFI/RI phase rather than dividing the project into the usual Phase I and II efforts. If remedial action is determined to be necessary after evaluating the Final RFI/RI Report, an IM/IRA will be issued. If no action is needed, closure requirements will be satisfied by a ROD/CAD. The Closure Plans originally submitted to the Division will no longer be required.

If you have any questions concerning these comments, please contact Carl Spreng of the Division at 331-4457 or Dave Maxwell of EPA at 293-1082.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is written in dark ink and is positioned above the typed name.

Gary W. Baughman
Chief, Facilities Section
Hazardous Waste Control Program

Attachments

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
Jen Pepe, DOE
Farrel Hobbs, EG&G
Dennis Schubbee, EG&G
Jackie Berardini, CDH-OE